

EXHIBIT 3

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.,) 3:17-cv-00939-WHA
OTTOMOTTO LLC; OTTO)
TRUCKING LLC,)
Defendants.)

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF SCOTT BOEHMKE

San Francisco, California

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Volume I

Reported by:

SUZANNE F. GUDELJ, CSR No. 5111

Job No. 2596382

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1 were envisioning [REDACTED]

2 [REDACTED]

3 A It does not say that in this document.

4 Q Okay.

5 A This document was to demonstrate

6 positioning [REDACTED] that were the

7 lines shown in the graphs.

8 Q What lines?

9 A These lines (indicating).

10 Q And after you came up with what's in
11 Exhibit G, what did you -- what did you do with this
12 information?

13 A So this information was the plan B which
14 was not pursued after going through commercial
15 third-party efforts with [REDACTED]

16 Q And plan A was [REDACTED]

17 A Mm-hmm.

18 Q Plan B was -- did it have a name other than
19 plan B?

20 A It turned into Fuji.

21 Q And then what was plan C?

22 A Plan C was the Spider.

23 Q Okay. Was there a plan D?

24 A Not by name.

25 Q What does that mean, "not by name"?